

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA *

* **vs.** * **JKB-22-439**

DAVID WARREN *

* **Defendant** *

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING REPLIES
IN SUPPORT OF PRETRIAL MOTIONS**

Defendant David Warren, by and through his attorneys, John M. McKenna, Michael E. Lawlor, Adam C. Demetriou, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court extend the deadline within which to file replies in support of pretrial motions. In support of this Motion, counsel state the following.

1. On December 15, 2022, Mr. Warren and five others were charged in a one-count Indictment with racketeering conspiracy, in violation of 18 U.S.C. § 1962(d). (Indictment, ECF No. 1.) The Indictment alleges that beginning in or about 2014 and continuing through the date of the Indictment, the defendants in this case conspired to participate in the affairs of the Black Guerilla Family. The Indictment alleges 48 overt acts in furtherance of the charged racketeering conspiracy, including several murders and attempted murders.

2. On December 14, 2023, Mr. Warren filed several pretrial motions in this case. On May 10, 2024, the Government filed its responses. By Order of this Court, Mr. Warren is due to file any replies on or before June 10, 2024.

3. At this time, Mr. Warren respectfully requests that this Court extend the deadline for filing replies in support of pretrial motions through June 12, 2024.

4. The undersigned counsel are working diligently to complete the replies in this case. However, in light of the volume of discovery as well as several other filing deadlines counsel have had to meet over the past weeks, the undersigned counsel require some additional time to prepare and file the replies in this case.

5. The undersigned counsel have conferred with Assistant United States Attorney Ari Evans, who has indicated that the Government does not oppose the requested extension.

6. For these reasons, Mr. Warren respectfully requests that this Court extend the deadline by which to file replies in support of pretrial motions through June 12, 2024.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, June 10, 2024, a copy of the foregoing sent via ECF to all parties.

/s/

John M. McKenna